

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

UNITED STATES OF AMERICA )  
 ) Case No. 3:24-cr-00151  
 v. )  
 ) JUDGE RICHARDSON  
MATTHEW ISAAC KNOOT )

**RESPONSE OF THE UNITED STATES TO COURT'S  
SECOND ORDER REGARDING ADDITIONAL DISCOVERY**

Comes now the United States of America, by and through the undersigned Assistant United States Attorney, Joshua A. Kurtzman, and United States Department of Justice Trial Attorney Gregory J. Nicosia, Jr., and responds to the Court's second Order regarding additional discovery.

## **PROCEDURAL BACKGROUND**

On May 9, 2025, Defendant filed a Motion to Continue Trial and Related Deadlines, along with a waiver of speedy trial executed by the defendant. (DE # 58 and 59.) The same day, the United States gave notice of its filing of a Classified *Ex Parte, In Camera*, Under Seal Motion and Memorandum of Law in Support of Protective Order pursuant to Section 4 of the Classified Information Procedures Act and Rule 16(d)(1) of the Federal Rules of Criminal Procedure. (DE # 57.) The United States filed its response in opposition to Defendant’s Motion to Continue Trial and Related Deadlines on May 13, 2025. (DE # 64.) On May 14, 2025, the Court issued an Order directing the United States to advise “whether. . . it is anticipated or at least possible that additional discovery may be provided to Defendant.” (DE # 65.) On May 15, 2025, the United States filed a response, notifying the Court that it “does not anticipate production of any further discovery to the Defendant.” (DE # 67.) On May 16, 2025, the Court issued a second Order directing the United States to “advise the Court . . . if production of additional discovery remains at least *possible* pending the ultimate outcome of the Motion at Docket No. 57.” (DE # 68.) (emphasis original).

## **RESPONSE**

Should the Court deny the Motion for a Protective Order, in whole or in part, the production of additional discovery is at least possible. Otherwise, the United States does not anticipate production of further discovery to the Defendant.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that the above document was filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

Date: May 16, 2025

*s/ Gregory Jon Nicosia, Jr.*  
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